

ORIGINAL

JUDGE SWAIN

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

LUIS DEJESUS,  
a/k/a "Manny,"

Defendant.

**INDICTMENT**

24 Cr.

**24 CRIM 59**

**COUNT ONE**

**(Possession of Ammunition After a Felony Conviction)**

The Grand Jury charges:

1. On or about October 15, 2023, in the Southern District of New York and elsewhere, LUIS DEJESUS, a/k/a "Manny," the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, (i) three Fiocchi Ammunition USA (G.F.L.) 9mm cartridge cases, (ii) eight Hornady Manufacturing Company cartridge cases, and (iii) one round of Armscor 9mm round of ammunition, and the ammunition was in and affecting commerce.

(Title 18, United States Code, Section 922(g)(1).)

**COUNT TWO**

**(Possession of Firearm and Ammunition After a Felony Conviction)**

The Grand Jury further charges:

2. On or about November 15, 2023, in the Southern District of New York and elsewhere, LUIS DEJESUS, a/k/a "Manny," the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed (i) a firearm, to wit, a 9mm Smith and Wesson handgun serial number FCB5527 and (ii) ammunition, to wit, (i) nine rounds of Hornady Manufacturing Company 9mm

ammunition, (ii) one round of Speer 9mm ammunition, and (iii) one round of Armscor 9mm ammunition; and the firearm and ammunition were in and affecting commerce.

(Title 18, United States Code, Section 922(g)(1).)

**COUNT THREE**  
**(Distribution of Controlled Substances)**

The Grand Jury further charges:

3. On or about November 15, 2023, in the Southern District of New York and elsewhere, LUIS DEJESUS, a/k/a “Manny,” the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).)

**COUNT FOUR**  
**(Firearms Use, Carrying, and Possession)**

The Grand Jury further charges:

5. On or about November 15, 2023, in the Southern District of New York and elsewhere, LUIS DEJESUS, a/k/a “Manny,” the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count Three of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

**FORFEITURE ALLEGATION**

6. As a result of committing the offense alleged in Counts Two and Four of this Indictment, LUIS DEJESUS, a/k/a “Manny,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense, including but not limited to a Smith & Wesson 9mm handgun, serial number FCB5527.

7. As a result of committing the offense alleged in Count Three of this Indictment, LUIS DEJESUS, a/k/a “Manny,” the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

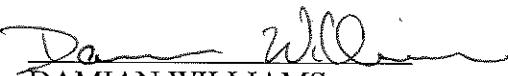
8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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FOREPERSON

  
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DAMIAN WILLIAMS  
United States Attorney